

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

Google LLC, YouTube LLC, James JACKSON,
also known online as “ONISION,” and LUCAS
JACKSON, formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE No: 1:23-cv-00223-HYJ-SJB

HON. HALA Y. JARBOU

****CORRECTED****

**MOTION BY DEFENDANTS GOOGLE LLC AND YOUTUBE, LLC TO
TRANSFER TO THE NORTHERN DISTRICT OF CALIFORNIA**

Pursuant to 28 U.S.C. 1404(a), Defendants Google LLC and YouTube, LLC move this Court to transfer Plaintiff’s Complaint in its entirety to the Northern District of California, San Jose Division. As set out more fully in the accompanying Brief in Support of this Motion, Plaintiff’s claims are subject to a binding forum selection clause which requires transfer to the Northern District of California, where Plaintiff and the remaining individual defendants have agreed to litigate any disputes subject to the governing forum-selection agreement.

Pursuant to Local Rule 7.1(d), counsel for Defendants certifies that he requested Plaintiff’s and individual Defendants’ concurrence in this Motion via email and phone correspondence. Plaintiff does not concur in the relief sought in this Motion and intends to file an opposition. Individual Defendants do not concur in the relief sought in this Motion.

Respectfully submitted,

Clark Hill PLC

By: /s/ Christopher M. Trebilcock

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DATE: May 22, 2023

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DATE: May 22, 2023

Attorneys for Defendants
GOOGLE LLC and YOUTUBE, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2023, I caused the foregoing paper to be electronically filed with the Clerk of Court using the ECF system, which will send notification to counsel of record.

By: /s/ Christopher M. Trebilcock
Christopher M. Trebilcock